



arrangement of the bunk beds in Units A and B of the C. Carlos Carreiro Immigration Detention Center.

4. I am familiar with the CPS Medical Guidelines developed by Dr. Nicholas Rencricca and Deborah Jezard. I am also familiar with guidance from both the Centers for Disease Control (“CDC”) and the Massachusetts Department of Public Health (“DPH”) as they relate to the coronavirus pandemic. I have been trained regarding these guidelines at BCHOC and I have accessed both the CDC and DPH websites regarding COVID-19.
5. I understand that both the CDC and DPH recommend a number of practices to prevent or minimize the spread of COVID-19. These include, but are by no means limited to, practicing social distancing by keeping six feet away from other individuals, washing one’s hands regularly with soap and water, disinfecting common areas used by multiple individuals, isolating persons suspected of illness, the use of masks, appropriate coughing/sneezing protective steps, and other steps.
6. BCHOC, and its contracted health care provider CPS, have taken extensive steps to increase the safety of both staff and detainees/inmates at BCHOC regarding the coronavirus. These steps were outlined in Dr. Rencricca’s affidavit and I will not repeat them here. But I will note that we have all been working diligently, and with great care and attention, to minimize the risk of a COVID-19 outbreak at BCHOC. This is reflected in the fact that there remains no confirmed cases of COVID-19 infection among either detainees or inmates at this time, despite the spiking of cases outside the prison.
7. Based upon my familiarity with the CDC and DPH guidelines and my presence in the

detainee units every work day, I am confident that the detainee population is sufficiently low so as to allow adequate social distancing (separation of six feet or more) to be practiced in all of the detainee units. It is ultimately up to the detainees to exercise appropriate care, however. We cannot force the detainees to stay six feet away from each other every moment if they choose not to do so. But there is sufficient space for them to do so. I speak as someone who is in those units every day, and not as an outside expert who is offering a theoretical opinion about jails in general.

8. I have been informed that some detainees have represented that there is insufficient hand soap or toilet paper to practice proper hygiene. This is simply not true. No detainee has complained to me or my staff about that, and we would make sure that BCHOC staff corrected any such deficiency immediately if it existed and we were made aware. I obviously cannot say that no bathroom stall has ever run out of toilet paper, but I am confident that this has not been an ongoing or pervasive issue.
9. In conclusion, I firmly believe that adequate social distancing and proper hygiene can be maintained at BCHOC under current conditions. I also believe that many of the detainees receive a level of medical care that they have not, and likely would not, receive outside BCHOC. We have had many inmates and detainees learn of a medical issue for the first time while under our care as a result of our thoroughness.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS NINTH DAY OF APRIL, 2020.

/s/ Nelly Floriano

Nelly Floriano  
Nursing Supervisor, ICE Units